

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

John Saiger }  
Plaintiff } Case no: 13C5495  
v }  
Tom Dart, et. al. } Judge: Sharon Johnson  
Defendants } Coleman

MOTION FOR APPOINTMENT  
OF COUNSEL

1. I John Saiger declare that I am The Plaintiff in the above entitled proceeding and state that I am unable to afford the services of an attorney, and hereby request the Court to appoint Counsel to represent me in this proceeding.
2. In Support of my motion, I declare that I have contacted the following attorneys/organizations seeking representation and been turned down.
  - A. ACLU of Illinois  
180 N. Michigan  
Chicago IL 60601
  - B. Legal Assistance Foundation  
111 West Jackson  
Chicago IL 60604
  - C. Uptown Peoples Law Center  
4413 N. Sheridan  
Chicago IL 60640
  - D. Kirkland and Ellis  
200 E. Randolph  
Chicago IL 60601

3. In further support of my Motion, I declare that I previously have been represented by an attorney appointed by this Court in the following Proceedings:

Saiger v. Fargus, Case No: 10 CV-03387

Judge: Sharon Johnson Coleman

Appointed Attorney: James L. Oakley

Thompson, Coburn, Fagel and  
Haber.

55 E. Monroe<sup>st</sup>

Chicago IL 60603

Final Disposition: Settlement.

In addition I declare that the claim made in the above stated proceedings is nearly identical to the claim made in the proceedings currently in front of the Court.

4. In further support of my Motion, I declare that I have previously filed an application for leave to proceed in forma pauperis in this proceeding and it is a true and correct representation of my financial status.

5. In further support of my Motion, I declare that I am currently detained with the Cook County Department

of Corrections and am housed in the Division 8 Residential Treatment Unit (RTU) at the present time.

6. In further support of my Motion, I declare that I have been diagnosed with Bi-Polar I (one) disorder and Manic Depression by multiple psychiatrists and that my mental illness affects my ability to effectively and completely represent My claim before this Court in an effective manner.
7. In further support of My Motion, I declare that I have been prescribed the following psychotropic medications in order to treat my mental illness: Lithium, Risperidol, trazadone, Klonopin, Depakote and Prozac. The psychotropic medications that have been prescribed to me have adverse side effects which can limit my ability to concentrate and focus for any length of time.
8. In further support of my Motion, I declare that I have previously, just prior to my arrest and detention on March 12<sup>th</sup> 2013, applied to

The Social Security Administration to be declared fully disabled due to Mental illness and that my diagnosis fits the Criteria for such a declaration. I also declare that upon my release I intend to resume the application process with which I was unable to complete,

9. In further support of my Motion, I declare that the Division 8 RTU in which I am housed does not have a Law Library that I can physically visit and that all legal materials must be obtained by request and are delivered to the inmate on the tier in which he is housed. All inmates are limited to one (1) request session every thirty days (30). In addition every inmate is limited to three (3) cases/copies of legal materials per session. Inmates do not have access to legal dictionaries, textbooks or reference books while studying or making use of their requested materials and if they need a legal phrase or term defined or explained they must wait until their next monthly session and any

definition provided counts as one of their three (3) allowed cases/copies of legal Materials per Session.

10. In further support of my motion, I declare that this motion and all other filings including the plaintiffs complaint were prepared with the help of a second individual whom as of January 1<sup>st</sup> 2014 no longer will be able to assist the Plaintiff in these proceedings.
11. In further support of my motion, I declare that the basic claim made in the plaintiffs complaint is deliberate indifference to a serious dental and medical condition and that the plaintiff has no medical or dental training and as such the plaintiff may not be able to effectively represent the seriousness of his injury or be able to effectively refute any counter-claims or attempts made by the defense to argue the seriousness of the plaintiffs injury.
12. Therefore, the Plaintiff prays that the Court, after considering all of the

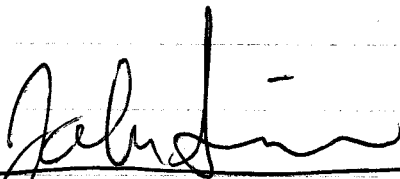
above Stated Declarations, will determine that the Plaintiff's ability to present his Claim effectively without the assistance of counsel is seriously hindered and shall appoint Counsel to the Plaintiff for these proceedings.

13. The Plaintiff declares under the penalty of perjury that the foregoing is true and correct to the best of the Plaintiff's knowledge and belief at the time of the drafting of this Motion.

Respectfully Submitted

12-26-13

DATE

  
\_\_\_\_\_  
John Saiger  
20130313060  
PO Box 089002  
Chicago IL 60608